

MICHELE BECKWITH
Acting United States Attorney
ADRIAN T. KINSELLA
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMESH KUMAR BIRLA JR., and
SHAMINDERJIT SINGH SANDHU,

Defendants.

CASE NO. 2:23-CR-0094 DJC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: January 23, 2025
TIME: 9:00 a.m.

COURT: Hon. Daniel J. Calabretta

STIPULATION

1. By previous order, this matter was set for status on January 23, 2025. ECF No. 91.
2. By this stipulation, defendants now move to continue the status conference until April 10, 2025, at 9:00 a.m., and to exclude time between January 23, 2025, and April 10, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes over 35 gigabytes of evidence in electronic form, including: investigative reports and related documents, covertly recorded videos, pictures, and calls; recorded statements by the defendants and other witnesses, and other evidence. Many of the audio recordings are in the Punjabi language. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

1 b) Counsel for defendants desire additional time to consult with their clients, to
2 review the current and forthcoming discovery, to conduct research and investigation related to
3 the current charges, to discuss potential resolutions with their clients, to prepare pretrial motions,
4 and to otherwise prepare for trial. Additionally, Mr. Erick Guzman, counsel for Defendant
5 Sandhu, has expressed he will be in trial during the week of January 20, 2025.

6 c) Counsel for defendants believe that failure to grant the above-requested
7 continuance would deny them the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
14 et seq., within which trial must commence, the time period of January 23, 2025 to April 10,
15 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
16 T4] because it results from a continuance granted by the Court at defendant's request on the basis
17 of the Court's finding that the ends of justice served by taking such action outweigh the best
18 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: January 15, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Adrian T. Kinsella
ADRIAN T. KINSELLA
Assistant United States Attorney

Dated: January 15, 2025

/s/ Toni White
TONI WHITE
Counsel for Defendant
RAMESH KUMAR BIRLA JR.

Dated: January 15, 2025

/s/ Erick Guzman
JAI GOHEL
ERICK GUZMAN
Counsel for Defendant
SHAMINDERJIT SINGH SANDHU

ORDER

IT IS SO FOUND AND ORDERED this 15th day of January, 2025.

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE